

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

CATHERINE GAUJACQ)

Plaintiff,)

v.)

No. 1:05CV0969 (JGP)

ELECTRICITE DE FRANCE)
INTERNATIONAL NORTH AMERICA,)
INC., et al.)

Defendants.)

CONSENT ORDER

On December 30, 2005, Defendants Electricite de France (“EDF”), Electricite de France International North America (“EDFINA”), and Christian Nadal (“Mr. Nadal”), filed Defendants’ Motion to Compel and For a Protective Order. On January 18, 2006, Plaintiff, Catherine Gaujacq (“Ms. Gaujacq”), filed a Supplement to Alert this Court to New Developments Impacting the Motions Before this Court and Motion for Enforcement of the Rules. The parties having come to an agreement concerning the issues raised in those motions, hereby agree to withdraw these motions, based upon the following agreement reached between the parties. Accordingly, it is hereby

ORDERED, as follows:

- 1) The deposition of Ms. Gaujacq will be taken at the offices of Charlson, Bredehoft & Cohen, P.C.C. in Reston, Virginia on March 16 and 17, 2006, beginning at 9:30 a.m. each day. The deposition will be limited to 7 hours each day (excluding reasonable breaks taken by either party), unless agreed upon otherwise by the parties, or unless a party seeks further Order of this Court;
- 2) EDF will provide counsel for Plaintiff by close of business March 17, 2006 a list of the areas of knowledge from Attachment A of Plaintiff’s 30(b)(6) deposition notice

to EDFINA and Plaintiff's 30(b)(6) deposition notice to EDF detailing which specific topic areas (by number and letter) the EDF corporate designee will be prepared to testify at his or her deposition scheduled for March 23 and 24, and which areas Mr. Nadal will testify to on behalf of EDFINA or EDF at his deposition scheduled for April 4 and 5. In the event there are areas of Attachment A not designated for either witness, EDF and EDFINA shall provide plaintiff with designations of the witnesses to testify as to those topic areas, and arrange for a mutually agreeable time, date and place for such testimony;

- 3) The deposition of the corporate designee for EDF, pursuant to Rule 30(b)(6), will be taken at the offices of Steptoe & Johnson, LLP in Washington D.C. on March 23 and 24, 2006, beginning each day at 9:30 a.m. each day. An interpreter will be provided at the expense of Ms. Gaujacq. The deposition will be limited to 7 hours each day (excluding reasonable breaks taken by either party), unless agreed upon otherwise by the parties, or unless a party seeks further Order of this Court;
- 4) The deposition of Mr. Nadal, both in his individual capacity and in his capacity as corporate designee for EDF and EDFINA, will be taken at the offices of Steptoe & Johnson, LLP in Washington D.C. on April 4 and 5, 2006, beginning at 9:30 a.m. The deposition will be limited to 7 hours each day (excluding reasonable breaks taken by either party), unless agreed upon otherwise by the parties, or unless a party seeks further Order of this Court;
- 5) The deposition of Mr. Yann Laroche will be taken on April 21, 2006, in Paris, France at the offices of EDF's outside counsel, Gide Loyrette Nouel, 26, cours Albert 1er, 75000 Paris, beginning at 8:30 a.m. An interpreter will be provided at the expense of Ms. Gaujacq and a court reporter will be obtained at the expense of Ms.

Gaujacq. The parties agree to abide by the Federal Rules of Civil Procedure governing the taking of the deposition, and that the deposition may be used for all purposes permitted by the Federal Rules of Civil Procedure and the Local Rules of this Court. No party will challenge the legality of the taking of the deposition or the use of the deposition transcript in this litigation;

- 6) The deposition of Ms. Adja Ba will be taken at the offices of Steptoe & Johnson, LLP in Washington D.C. on April 17, 2006, beginning at 10:00 a.m.;
- 7) The deposition of Mr. Alexandre Audie will be taken at the offices of Steptoe & Johnson, LLP in Washington D.C. on April 25, 2006, beginning at 10:00 a.m.;
- 8) Unless otherwise set forth in this Order, agreed upon by the parties, or by further Order of this Court, each day of deposition will last a maximum of seven (7) hours, excluding reasonable breaks taken by either party;
- 9) All parties are free to request this Court's assistance in scheduling less than or additional time of deposition for each deponent, if any party feels the deposition is being unreasonably extended or delayed, or there is otherwise good cause to extend or decrease the time for completion of the deposition;
- 10) Of the depositions scheduled in this Order, Plaintiff is responsible for providing interpreters for only the depositions of the EDF 30(b)(6) corporate designee and Mr. Laroche, and, if EDF and EDFINA determine in good faith that Mr. Audie requires an interpreter, Ms. Gaujacq is responsible for providing an interpreter for Mr. Audie's deposition as well;
- 11) Ms. Gaujacq, Mr. Nadal, and Ms. Ba do not require interpreters during their respective depositions. Counsel for EDF and EDFINA will advise Ms. Gaujacq's

counsel by April 6, 2006 if an interpreter will be required for the deposition of Mr.

Audie.

SO ORDERED.

DATE: _____

Hon. John Garrett Penn
United States District Judge

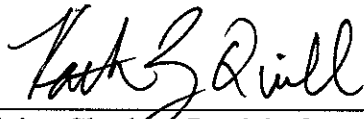
AGREED TO AS TO FORM AND CONTENT:

Counsel for Plaintiff
Catherine Gaujacq

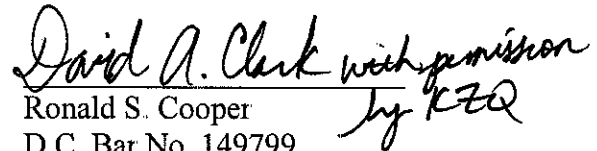
Counsel for Defendant
Christian Nadal

CHARLSON BREDEHOFT & COHEN, P.C.

STEPTOE & JOHNSON, LLP



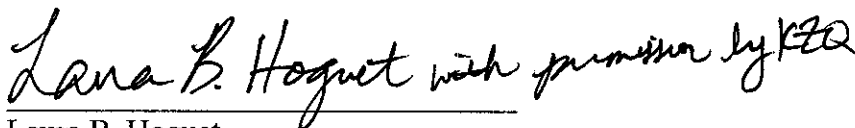
Elaine Charlson Bredehoft
D.C. Bar No. 441425
Kathleen Z. Quill
D.C. Bar No. 489079
CHARLSON BREDEHOFT & COHEN, P.C.
11260 Roger Bacon Drive, Ste 201
Reston, Virginia 20190
(703) 318-6800



Ronald S. Cooper
D.C. Bar No. 149799
David A. Clark
D.C. Bar No. 473279
STEPTOE & JOHNSON, LLP
1330 Connecticut Ave., NW
Washington, D.C. 20036
(202) 429-3000

Counsel for Defendants
Electricite de France International North America
& Electricite de France

HOGUET NEWMAN & REGAL, LLP



Laura B. Hoguet
D.C. Bar No. 200915
Dorothea W. Regal, Esq.
HOGUET NEWMAN & REGAL, LLP
10 East 40th Street
New York, New York 10016
(212) 689-8808